Nancy Morris

To Tri-Party Agencies:

I have commented on Hanford nuclear waste cleanup since the late 1980's onward to present – around 35 years. Cleanup should be much further along than it is now. Truly the 177 underground leak-prone tanks holding 56 million gallons of high-level waste are a serious threat to human health now and generations to come, the entire environment at Hanford and all its surrounds, and the Columbia River. The First Nations people of the 'Confederated Tribes and Bands of the Yakama Nation' and the 'Confederated Tribes of the Umatilla Indian Reservation' should have had more involvement and need to be involved to ensure a better schedule and prognosis than has been offered by the Tri-Party Agreement Agencies that are comprised of the Dept of Ecology, EPA Region 10, and the USDOE.

I agree with Governor Kotek who stated to the USDOE that . . . "three critical issues that are left open for future decisions by Energy, without any commitment for public comment or consultation with Tribes or Oregon. These issues include, what form tank waste will take if shipped off site, how communities along shipping routes will be engaged, and clarity around the environmental review for these major decisions".

I urgently demand that:

The federal government treats tank waste as the law requires. The Nuclear Waste Policy Act defines tank waste as high-level waste. Rather than forbearing the use of a new, weaker definition of high-level waste, Energy should permanently abandon plans to apply this definition at Hanford; The TPA agencies provide adequate information and opportunities for the public to comment on major proposed changes to cleanup, such as the adequacy of proposed new tank capacity and the proposal to ship large volumes of tank waste through communities in liquid or solid form; Ecology and EPA explain why the standard "as good as glass" applies to treated and immobilized tank waste in Washington, but not elsewhere.

Environmental reviews are available to the public to review while commenting on the proposed changes. The agencies seem to be putting the cart before the horse, making sweeping changes to Hanford's cleanup plan and finalizing a settlement without having conducted a full environmental NEPA and SEPA analysis of the impacts of its decisions.

The 2024 date for selecting a grouting alternative be removed from the proposed changes. This date is inappropriate and premature, it is not possible to have the information necessary to make such a decision at this time, much less provide the public, Tribes, states, stakeholders, and every person impacted by the storage, transportation, and disposition of tank waste notification so that they can consent to the risks being imposed upon them. WAIT FOR GROUT TEST RESULTS BEFORE ANY GROUT DECISION, DELAY NEW INTERIM MILESTONE M-062-64. Change the date for this milestone from Dec 2024 to *Within 12 months of receiving all relevant information from the 2,000 gallon Test Bed Initiative, including; the time it takes to find a grout recipe that works and hardens tailored to this specific tank waste, grout-to-waste ratios, grout setting time, performance of in-tank pre-treatment system, transportation reports, cost reports, and vendor quality of work from both commercial treatment and disposal sites in Texas and Utah. YOU MUST PROVIDE A PUBLIC COMMENT PERIOD ON YOUR PROPOSED GROUT DECISION PRIOR TO FINALIZING.

Finalization of the proposed changes be delayed until Tribal Nations have consulted with the TPA Agencies on the proposal. This should have happened prior to the settlement going public, robust consultation is not equivalent to after-the-fact "familiarization," with decisions that directly impact the lives and livelihoods of generations of Indigenous people. The settlement is astoundingly inappropriate in this regard, lacking entirely an analysis of how the people most impacted by these decisions will navigate the hazards and harms imposed on them.

Generations are at risk beyond our and the Tri-Party Agency representatives' lifetimes. Time to stop passing this horrific toxic nuclear waste legacy to your children and grandchildren and focus needed funding, research, and political will to cleanup the most toxic area in North America. Stop the continued delays.